

FILED

MAR 08 2018

MICHAEL D. PLANET  
Executive Officer and Clerk

BY: Deputy

L. Doenges

**RETURN TO SEARCH WARRANT**

Detective Keith Hall, being sworn, says that a search was conducted pursuant to the below described search warrant:

Issuing Magistrate: Honorable Judge Bennett

Magistrate's Court: Superior Court, Ventura Judicial District

Date of Issuance: 03-05-18

Date of Service: 03-06-18


And searched the following locations/persons:

Location #1

[REDACTED]

Refer to attached Search Warrant Property Record forms.

I further swear that this is a true and detailed account of all the property taken by me pursuant to the search warrant, and that pursuant to Penal Code Sections 1528 and 1536 this property will be retained in my custody, subject to the order of this court or of any other court in which the offense in respect to which the seized property is triable.

X   
Sr. Dep. Keith Hall #3472

(SIGNATURE OF AFFIANT)

Sworn to and subscribed before me this 8 day of March, 2018

  
SIGNATURE OF CLERK

Clerk of the Superior Court, Ventura Judicial District



## INVOLVED PERSONS

ROLE ARRESTEE - #1	NAME - LAST, FIRST, MIDDLE (ALIAS/MONIKER) LOCKLEAR, HEATHER			RACE WHITE	GENDER F	AGE 56	D.O.B. [REDACTED]		
HEIGHT	WEIGHT	HAIR	EYE	DRIVER'S LICENSE/STATE /					
ADDRESS [REDACTED]				HOME PHONE		MOBILE PHONE			
OCCUPATION	EMPLOYER	EMPLOYER ADDRESS				BUSINESS PHONE			
ROLE VICTIM - #1	NAME - LAST, FIRST, MIDDLE (ALIAS/MONIKER) [REDACTED]			RACE WHITE	GENDER M	AGE 56	D.O.B. [REDACTED]		
HEIGHT	WEIGHT	HAIR	EYE	DRIVER'S LICENSE/STATE /					
ADDRESS [REDACTED]				HOME PHONE		MOBILE PHONE			
OCCUPATION	EMPLOYER	EMPLOYER ADDRESS				BUSINESS PHONE			
RELATIONSHIP OF VICTIM TO OFFENDER									
ROLE INV PARTY - #1	NAME - LAST, FIRST, MIDDLE (ALIAS/MONIKER) [REDACTED]			RACE HISPANIC	GENDER F	AGE 33	D.O.B. [REDACTED]		
HEIGHT 5'03	WEIGHT 140	HAIR BROWN	EYE GREEN	DRIVER'S LICENSE/STATE [REDACTED]					
ADDRESS [REDACTED]				HOME PHONE		MOBILE PHONE [REDACTED]			
OCCUPATION [REDACTED]	EMPLOYER [REDACTED]	EMPLOYER ADDRESS [REDACTED]				BUSINESS PHONE			

WHERE LOOKED

ADDRESS

BOOKED EV PROPERTY ROOM.

ITEM # 101	EVIDENCE Y	ITEM STATUS SEARCH WARRANT	DESCRIPTION PICS OF [REDACTED] AND VEHICLES
DATE RECOVERED# 03-06-2018		LOCATION RECOVERED [REDACTED]	
OWNER			RELATED TO
1	ITEM PICS BY DET. HALL	VALUE	QUANTITY 23
RECOVERED			

***Do Not Duplicate*****Ventura County Sheriff's Office - Official Copy**Issued to:  
Issued by:  
Issued date:

DATE REPORTED 07-07-2018	REPORTING OFFICER / I.D. # - ORG. UNIT - SUBMIT DATE / TIME HALL, KEITH (3472) / Thousand Oaks Investigations - 03-07-2018 / 0931
APPROVED BY / ID # - APPROVED DATE / TIME	



ITEM # 102	EVIDENCE Y	ITEM STATUS SEARCH WARRANT	DESCRIPTION PICS BY DET. KIPP/ ENTRY & EXIT VIDEO		
DATE RECOVERED# 03-06-2018		LOCATION RECOVERED [REDACTED]			
OWNER		RELATED TO			
1	ITEM DISK W/DIGITAL PHOTOS/VIDEO		VALUE [REDACTED]	QUANTITY 29	RECOVERED
ITEM # 103	EVIDENCE Y	ITEM STATUS SEARCH WARRANT	DESCRIPTION INTERVIEWS		
DATE RECOVERED# 03-06-2018		LOCATION RECOVERED [REDACTED]			
OWNER		RELATED TO			
1	ITEM DISK W/ AUDIO RECORDING		VALUE [REDACTED]	QUANTITY 1	RECOVERED
ITEM # 104	EVIDENCE Y	ITEM STATUS SEARCH WARRANT	DESCRIPTION BWC FROM FILLMORE/ KIPP		
DATE RECOVERED# 03-06-2018		LOCATION RECOVERED UPLOADED TO EVIDENCE.COM			
OWNER		RELATED TO			
1	ITEM BODY WORN CAMERA VIDEO		VALUE [REDACTED]	QUANTITY 2	RECOVERED




STATE OF CALIFORNIA - COUNTY OF VENTURA  
SEARCH WARRANT AND AFFIDAVIT  
(AFFIDAVIT)

SW # 335-18

VENTURA SUPERIOR COURT FILED MAR 08 2018 MICHAEL D. PLANET Executive Officer and Clerk By: L. Doenges Deputy
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Keith Hall swears under oath the facts expressed in the attached and incorporated Statement of Probable Cause are true and based thereon there is probable cause to believe and does believe the property described below is lawfully seizable pursuant to California Penal Code section 1524, 1524.2, and 1546.1 as indicated below, and is now located at the locations set forth below. Wherefore, affiant requests that this Search Warrant be issued.

X   
Sr. Dep. Keith Hall #3472  
(Signature of Affiant)

NIGHT SEARCH REQUESTED: YES ☐ NO ☒

(SEARCH WARRANT)

THE PEOPLE OF THE STATE OF CALIFORNIA TO ANY SHERIFF, POLICEMAN OR PEACE OFFICER IN THE COUNTY OF VENTURA: Proof by affidavit having been made before me by Keith Hall that there is probable cause to believe the property described herein may be found at the locations set forth herein and it is lawfully seizable pursuant to Penal Code section 1524, 1524.2, and 1546.1, as indicated below by ☒ (s) in that:

- ☐ it was stolen or embezzled;
- ☐ it was used as the means of committing a felony;
- ☐ it is possessed by a person with the intent to use it as means of committing a public offense or is possessed by another, to whom he or she may have delivered it for the purpose of concealing it or preventing its discovery;
- ☒ it tends to show that a felony has been committed or that a particular person has committed a felony;
- ☐ it tends to show that sexual exploitation of a child, in violation of P.C. section 311.3, has occurred or is occurring;
- ☐ there is a warrant for the person's arrest;
- ☐ it tends to show, through information to be received from the use of a tracking device, that a felony has been or is being committed, tends to show that a particular person has committed a felony, or will assist in locating an individual who has committed or is committing a felony.



**YOU ARE THEREFORE COMMANDED TO SEARCH:**

**The following location:**

[REDACTED] City of Thousand Oaks, area commonly referred to as Westlake, County of Ventura, State of California. This residence is further described as a single-family residence on a flag lot in a gated community of the city of Thousand Oaks, county of Ventura, state of California. The gated community has two entrance-exits, one located just north of Westlake High School at 100 North Lakeview Canyon Road, and the other just south of the intersection of North Lakeview Canyon Road at Valley Spring Drive. The flag lot on which [REDACTED] is located also contains the residences at addresses [REDACTED] and [REDACTED]. The driveway to these three residences runs north-south, with the entrance at the north end, nearest the residence at [REDACTED] Drive, and terminates at the south end, nearest the residence at [REDACTED]. The residence at [REDACTED] is located between the residences at [REDACTED] and [REDACTED].

Several tan stucco pillars are located on the west side of the property nearest the common driveway. These pillars are incorporated into the fencing on the west side of the property. The view through the fence is obscured by numerous bushes. A similar stucco pillar is located directly north of the entrance to the gated driveway leading to the residence. This pillar is not incorporated into the fencing on the west side, contains a brown mailbox, and has the numbers [REDACTED] attached to the pillar above the mailbox. These numbers are brown in color and approximately three inches in height. The [REDACTED] runs east-west, and has a brown wrought-iron gate near its entrance. The front door of the residence is not visible from this wrought iron gate. The residence is a primarily a single-story residence, with a small rear portion appearing to have a second story. The residence has a tan stucco exterior and a red tile roof.







The location is to include all rooms, attics, basements and other parts therein; the surrounding grounds, any garages, storage rooms, trailers and outbuildings of any kind located thereon, as well as any combination safes or locked boxes therein.

**The following person:**

**Heather Deen Locklear**- date of birth [REDACTED]. Locklear is further described as a white female with blond hair, blue eyes, approximately 5 feet 5 inches tall and weighing approximately 112 pounds. [REDACTED]

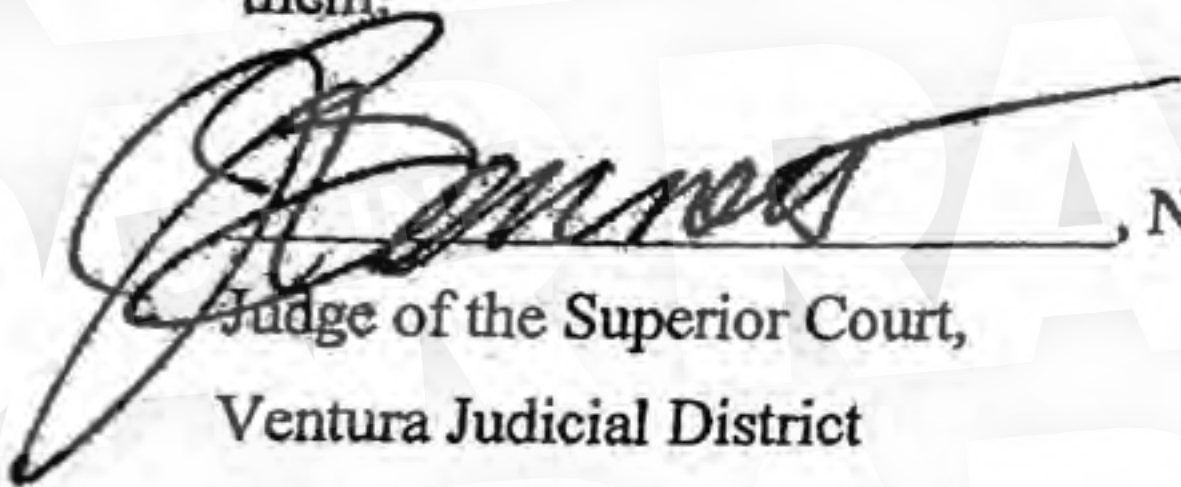
**FOR THE FOLLOWING PROPERTY:**

1. Papers, documents and property which show possession, dominion and control over said premises, including but not limited to keys, cancelled mail envelopes, rental agreements, and receipts, utility and telephone bills, photographs, filled prescription bottles, vehicle registrations, vehicle repair receipts, gas receipts, insurance papers, address and telephone books, diaries, government notice documents, clothing, and any kind of objects which bear a person's name, phone number or address.
2. Smith and Wesson revolver/ pistol, Model 60, .38 caliber, with a serial number of AEZ5651
3. Any ammunition holsters, firearms cleaning equipment, or paraphernalia related to the use or maintenance of firearms.



IT IS FURTHER ORDERED that the peace officers executing this search warrant are hereby authorized, pursuant to Penal Code section 1530, to bring onto the premises persons knowledgeable about the premises and/or its occupants, furnishings, and other items of personal property normally found within the premises, in order to, among other things, determine if any items of personal property are missing or otherwise out of place.

~~AND TO SEIZE IT IF FOUND~~ and bring it forthwith before me, or this court, at the courthouse of this court. This Search Warrant and incorporated Affidavit was sworn and subscribed before me on this 5 day of MARCH, 2018, at 4:29 A.M./P.M. Wherefore, I find probable cause for the issuance of this Search Warrant and Accompanying Orders and do issue them.

  
Judge of the Superior Court,  
Ventura Judicial District

NIGHT SEARCH APPROVED: YES ☐ NO ☒



## (STATEMENT OF PROBABLE CAUSE)

### I. Affiant Training and Experience

I, Keith Hall, am your affiant. I am a Senior Deputy Sheriff employed by the Ventura County Sheriff's Office since 1998. My assignments have included: Custody Division (1998-2000); Patrol (2000-2005), Traffic Enforcement/ Investigation (2005-2014), Background Investigations (2014-2015), Custody Division Supervisor (2015-2017), and Investigations-Crimes against persons and auto crimes (2017-Present). I have also had a collateral duty as a Field Training Officer, and am a member of SWAT.

I graduated from the Ventura County Criminal Justice Training Center and attained basic, intermediate and advanced P.O.S.T. certifications. I have received numerous hours of training in detecting and investigating crime and apprehending criminals. This training focused on investigating robbery, burglary, receiving stolen property, forgery, identity theft, embezzlement, other types of fraud, sexual assault, domestic violence, internet-related crimes, and traffic related crimes and investigation. The training was provided by the Ventura County Criminal Justice Training Center, the Ventura County Sheriff's Office, and training provided by outside agencies. I was a Field Training Officer ("FTO"), and in that capacity have trained several deputies in how to effectively investigate crime, apprehend criminals and conduct interviews.

I am also a former certified Drug Recognition Expert (DRE). I have completed numerous hours of training and interviewed drug users in the area of illicit narcotics, their packaging, transportation, sales, ingestion methods, and their effects on the human body. I have also provided expert opinion to the District Attorney's Office on many cases involving drug use and driving under the influence of drugs and alcohol.

During my employment with the Ventura County Sheriff's Office, I have investigated numerous cases involving people reporting forgery, fraud, identity theft, hit and run accidents, burglaries and crimes against persons. I have made numerous arrests and assisted with many arrests for said crimes, many of which have led to filing of criminal charges and convictions. I have conducted numerous probations searches and served search warrants. I have also interviewed forgers, assault suspects, theft suspects, burglars, prostitutes, robbers, drug users and drug dealers. From them, I have learned the methods they have used to commit their crimes.



I have consulted with experienced investigators, who have had several years of experience investigating major crime caseloads. These experienced investigators have trained me on the methods suspected criminals use to commit property crimes and major crimes.

**I. Investigation**

I am a Detective with the East County Investigations Bureau and was assigned to conduct a follow-up investigation involving threats made against Ventura County Sheriff's Office Deputies by Heather Deen Locklear. I have reviewed the reports authored by Sergeant Camou, Deputy Alldredge, Deputy Dent, Deputy Price, and Deputy Nesgis who are all fulltime law enforcement officers employed by the Ventura County Sheriff's Office. The incident was also captured on body worn cameras by the involved deputies. The following is a synopsis of their reports and my review of the footage:

On February 25, 2018, at approximately 2141 hours, Deputies of the Ventura County Sheriff's Office responded to [REDACTED], Westlake Village CA, 91360 for a 911 call for domestic disturbance between Heather Locklear and her boyfriend, [REDACTED]. Locklear and [REDACTED] are in a dating relationship and live together at the location.

Upon Deputy Alldredge's and Deputy Nesgis' arrival, Locklear's sister, [REDACTED], told them in person that Locklear reported to her that Locklear's boyfriend, [REDACTED], choked her and tried to kill her. [REDACTED] stated she did not know if that was actually the case, but Locklear wanted the police called.

Deputy Alldredge and Deputy Nesgis walked into the residence and heard arguing coming from a bedroom. Deputy Alldredge and Deputy Nesgis found Locklear and [REDACTED] in the bedroom. [REDACTED] was standing on the side of the bed leaning over Locklear and holding her wrists while Locklear was on the bed, lying back, with her feet on the floor. From my observations of the body worn camera recordings, it appeared that [REDACTED] was restraining Locklear on the bed. Neither of them was striking each other or appeared to be struggling.

Deputy Alldredge asked [REDACTED] to let go of Locklear and [REDACTED] immediately complied. Locklear stood up and said to [REDACTED] in an aggressive tone, "Good luck" while pointing



forcefully towards his face. Deputy Alldredge escorted [REDACTED] outside the bedroom to interview him. Deputy Alldredge saw that [REDACTED] was bleeding from the bridge of his nose and had redness on his chest. [REDACTED] told Deputy Alldredge that in the bedroom, Locklear attacked [REDACTED] while he was on the bed, and he defended himself. He did not know how many times Locklear struck him. Locklear bit his face and described Locklear as being "all over" him for the last 20-30 minutes acting "crazy," "angry," and "wild." [REDACTED] explained he did not want to go into detail, because he did not want Locklear to get in trouble. At one point during the interview, [REDACTED] changed his story and stated he was fine and that he hit his head when he "fell down." [REDACTED] denied battering Locklear.

Deputy Nesgis attempted to interview Locklear in the bedroom room. Deputy Nesgis offered Locklear medical attention, but she refused stating she was not injured. Locklear first said that [REDACTED] and she got into a fight, and [REDACTED] tried to "choke" her. Deputy Nesgis asked Locklear if there were any marks on her neck to which Locklear immediately replied, "No." Locklear said that [REDACTED] tried to choke her approximately 20-30 minutes prior, and it stopped her from breathing. Deputy Nesgis asked if [REDACTED] used both hands to strangle her, to which she replied, "I don't know." Locklear said the fight started when [REDACTED] lied to her, and she threw a can of "Red Bull" at him. [REDACTED] left, but Locklear told him to come back to talk, but [REDACTED] lied to her. Deputy Nesgis asked Locklear what [REDACTED] lied about. Locklear said, "Who cares. It's not really going to be any issue and I'm not telling."

Deputy Nesgis asked what happened after that. Locklear said, "Nothing. I don't know." Locklear said she just knew that [REDACTED] had tried to stop her from breathing. Deputy Nesgis attempted to get more details for the investigation by asking Locklear if they were facing each other when [REDACTED] strangled her. Locklear replied, "How could I face him? He was like this." Locklear demonstrated [REDACTED] actions by holding both arms straight out and simulated both hands wrapped around a neck. Deputy Nesgis asked if that meant [REDACTED] was behind Locklear. She said, "No, in front of me." Deputy Nesgis confirmed that [REDACTED] was facing her when he strangled her. Locklear said, "I guess. I don't even know. I fucking don't know who was behind or in front." Deputy Nesgis asked, "And you stopped breathing?" Locklear said, "No! I fucking kicked him!" When Deputy Nesgis attempted to get details, Locklear became agitated and uncooperative. Locklear abruptly stood up from where she was lying on the bed and stated,



"I don't want to do this anymore." She walked out of the bedroom and ordered Deputy Alldredge and Deputy Nesgis to leave the house.

Locklear yelled at the deputies, "Get the fuck out of my house!" Deputy Nesgis informed Locklear they were investigating a crime and were not going to leave. Locklear grabbed Deputy Alldredge by the bicep and pulled on it while ordering him to get out of the house. Deputy Alldredge tried to tell Heather they were investigating a crime, but she walked away stating she would call the police and she did not care if she was wrong. Locklear was extremely agitated and upset.

Locklear walked to her bedroom and began to close the door. Deputy Alldredge put his foot in the doorway to prevent her from closing it, and to continue the investigation. Heather attempted to push Deputy Alldredge out of the doorway, and screamed, "Get the fuck out of my house!" She battered Deputy Alldredge by kicking him in his shin in an attempt to get his foot out of the doorway. The force was strong enough to force Deputy Alldredge's leg out of the doorway. Locklear slammed the door on Deputy Alldredge. Deputy Nesgis asked [REDACTED] if there were any weapons in the house. [REDACTED] replied, "No." Deputy Nesgis asked Heisser if he choked Locklear. [REDACTED] replied, "I didn't touch her."

Sergeant Camou asked Locklear to exit the bedroom several times before she complied. She continued to yell and scream at the deputies to leave her house while pacing back and forth in a very aggressive manner. Locklear yelled profanities at the deputies and tried to physically push Sergeant Camou and Deputy Nesgis with her hands out of the house. Deputy Nesgis told Locklear to keep her hands off of her. Sergeant Camou told Locklear several times the deputies needed to investigate and reminded Locklear that she is the one who asked her friend to call the police for her. Locklear denied requesting that the police be called.

Locklear exited the house and sat in her car. Sergeant Camou stood by with her. Locklear exited her car and walked back into the house where deputies were interviewing witnesses. Locklear charged at Deputy Nesgis while screaming, "Get out of my fucking house!" Locklear grabbed Deputy Nesgis and tried to push her out of the room. Deputy Nesgis ordered Locklear not to touch her. Sergeant Camou had to grab Locklear's arms to restrain her. Locklear continued to struggle and resist as Deputy Nesgis handcuffed her. Locklear was lying



on her stomach handcuffed. As Deputy Nesgis rolled Heather onto her right side to stand her up, she kicked Sergeant Camou with her left foot.

After gaining control of Locklear, deputies escorted her outside to a patrol car. Locklear continued to scream that [REDACTED] tried to kill her, but she would not calm down enough to give the deputies a statement. She continued to curse and scream at the deputies. At one point, deputies had to pin Heather against her vehicle with their body weight to control her. At one point she screamed, "He tried to kill me. He's a felon! Let me the fuck go!" Due to her combative behavior, deputies placed a hobble around Locklear's ankles to prevent her from kicking deputies. Locklear screamed at Deputy Nesgis, "You fucking deserve your kids to die! You fucking deserve it! And when you find yourself in that position, think of me!"

Deputy Alldredge was able to get Locklear to calm somewhat. Locklear told Deputy Alldredge that [REDACTED] had strangled her and that she was afraid he would kill her. Locklear stated she asked her girlfriend to call the police for her because [REDACTED] strangled her. Deputy Alldredge asked Locklear if she needed medical attention. She refused. Locklear stated she did not lose consciousness, but was strangled for a long time and thought she might pass out. Deputy Alldredge attempted to read Locklear her Miranda Rights, but she cut him off before he could finish the advisement stating, "I'll wait for a lawyer." Deputies were able to talk Locklear to get into the police car.

Deputy Nesgis interviewed other witnesses at the scene. [REDACTED] and was at the residence during the incident. [REDACTED] is in college, but was present at the house that night. [REDACTED] could hear Locklear and [REDACTED] yelling, but could not determine what was said. [REDACTED] walked outside and saw Locklear and [REDACTED] sitting in a car. They were grabbing at each other, but could not tell who was trying to restrain whom. [REDACTED] said Locklear had been drinking.

[REDACTED] told Deputy Nesgis he heard yelling, but could not hear what was said. [REDACTED] saw Heather struggling with Sergeant Camou and refusing to obey the deputies' commands. Chance did not see Heather kick Sergeant Camou.



Deputy Nesgis interviewed [REDACTED] [REDACTED] is Locklear's friend and she lives in the Locklear residence. [REDACTED] told Deputy Nesgis that she found Locklear and [REDACTED] sitting in a car parked in the driveway. Locklear was in the front passenger seat and [REDACTED] was in the driver's seat. Locklear was kicking [REDACTED] and was not allowing him to leave. [REDACTED] tried to get Locklear away from [REDACTED] by asking her to come inside, but Locklear refused to get out of the car. [REDACTED] got out of the car and Locklear followed him. Locklear told [REDACTED] to call the police, because [REDACTED] had choked her. [REDACTED] did not see [REDACTED] hit or choke Locklear. [REDACTED] stated that once [REDACTED] and Locklear were inside the room, she stayed outside until the police arrived.

Deputy Dent interviewed Locklear's sister, [REDACTED] [REDACTED] saw [REDACTED] car parked in the driveway and [REDACTED] was standing outside of the car. [REDACTED] was in the driver's seat and Locklear was in the front passenger seat. The front passenger door was open, and Locklear was lying on her back with her head outside the open door. Locklear was kicking at [REDACTED]'s upper body. Locklear was screaming at [REDACTED] that he could not leave, because he was going to get arrested. Locklear asked [REDACTED] to call 911, because [REDACTED] had choked her. She saw [REDACTED] try to hold Locklear to defend himself, but never saw [REDACTED] batter Locklear. [REDACTED] took [REDACTED] cell phone and called the police. Locklear stopped hitting [REDACTED] and went inside the house. She came back outside and yelled at [REDACTED] to come inside, which he did. Shortly afterward, deputies arrived.

During the incident, Locklear would repeatedly yell that [REDACTED] choked her, but would not cooperate with the investigation. While they were taking Locklear into custody, she violently resisted by kicking the deputies. Locklear told the deputies, "He tried to kill me. He's a felon! Let me the fuck go!" Deputies ultimately arrested Locklear for violating Penal Code sections 243(b) and 273.5(a). When taken to the hospital, deputies remained at Locklear's home to complete the investigation.

Due to Locklear's claims that she was choked, Deputy Alldredge transported Locklear to Los Robles Hospital for a medical clearance per the strangulation protocol and Deputy Price assisted. On the way to the hospital, Locklear continued to be belligerent making statements that she hoped Deputy Alldredge and his wife and kids would die. While at the hospital, Locklear kicked Deputy Price in the groin area. Locklear continued to be belligerent and stated to the deputies, "I hope no one fucking burns your entire department down, your fucking police



subject. [REDACTED]

[REDACTED] In 2010, she was cited and released for Vehicle Code 20002(a)(1) - hit and run. There are additional calls for service dating back to 1991 that listed [REDACTED], Westlake Village CA. 91360 as Locklear's home address. There are also out of county arrests for drug and alcohol use. I conducted an additional record check of the address of the Ventura County Assessor's Property Database. The address shows the residence is owned by the Heather Locklear D Trust. The date of sale was November 30, 1990.

### **III. Opinions and Conclusions**

I believe that based on my training and experience, and this investigation that Heather Locklear exhibited combative, belligerent, and aggressive behavior toward deputies during their investigation. Locklear battered [REDACTED] resulting in visible injury, a violation of Penal Code 273.5(a)- Domestic Violence, a felony. She also battered several deputies, a violation of Penal Code 243(b)- Battery on a peace officer. Additionally, Locklear made a threat to shoot police if they come to her home again which I believe to be a felony violation of Penal Code 69- Threat against an executive officer. I base this belief on the history of law enforcement responses to her residence, and the threat Locklear made towards the deputies stating, "Get the fuck off my property. Don't ever come on it. All of you are not allowed. I don't give a fuck if anyone calls you. I will shoot you if you come on my property and take that as a threat and fucking put another count against me."

Based on Locklear's statement about shooting police, coupled with her having a Smith and Wesson Model 60 .38 caliber pistol with a serial number of AEZ5651 registered to her only five years prior to moving into her current residence, I believe she is in possession of this firearm and possibly others. Moreover, the existence of this firearm lends credibility to Locklear's threat to shoot deputies during the lawful performance of their duties. Given that Locklear was under arrest for Penal Code 273.5(a) and Penal Code 243(b) at the time she made the threat, it appears the threat was designed to prevent or deter deputies from further investigating the crimes for which she had been arrested. The presence of a gun in Locklear's home would tend to prove that she made the threat with the requisite intent, namely to prevent or deter an executive officer from performing his or her duties. Locklear's possession of a gun



shows she had the ability to act on her threat to shoot deputies. The seizure of this and any other firearm located on the premises will not only provide further evidence of her intent to commit a Penal Code 69 but will also prevent Locklear from carrying out her threat against law enforcement.

Locklear has a history of drug and alcohol related incidents. Based on her daughter's statement, Locklear had also been drinking on this night as well and appeared out of control. Based on my training and experience, I know that people who are intoxicated by drugs and/or alcohol exhibit lowered inhibitions, clouded judgement, erratic behavior, aggression, and are unpredictable. Furthermore, deputies have responded to her residence in regards to Locklear being reported as a suicidal subject. Based on my training and experience, suicidal people have been known to commit "suicide by cop" where the subject intentionally provokes a lethal force encounter to force police to shoot them as a method of suicide.

Due to the history of past police responses, there is a high probability that police will respond again to Locklear's home in the future. Her threat to shoot police the next time they respond to her home, coupled with her erratic, aggressive behavior toward law enforcement, and the fact there is a record that Locklear does own a firearm presents a legitimate threat to law enforcement. Aside from the probability of police having to respond to her home again, Locklear's threat to stalk deputies indicates a continuing threat to law enforcement.

I believed that [REDACTED], Westlake Village CA. 91360 is Heather Locklear's correct home address based on the Ventura County Assessor's Property Database, and this is where she was arrested during this incident. Additionally, there are numerous police contacts that list that address for Locklear spanning back to 1991.

Wherefore it is respectfully requested that a search warrant for the above property be issued. I swear under penalty of perjury that the foregoing is true and correct to the best of my information and belief.